

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Exide Technologies
 ADDRESS: 913 S. 10th ST.
Manchester, IA 52057
 EPA ID NUMBER: IA0069619765 DATE: 05/25/2017

RECEIVED
 JUN 02 2017
 AWMD/WEMM

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to make a hazardous waste determination on four different containers of waste in the Waste Building, 40CFR 262.11.
2. Failure to label three universal waste lamp containers with the words "universal waste lamps," or "waste lamps," or "used lamps," 40CFR 273.14(e).
3. Failure to close hazardous waste satellite accumulation container, 40CFR 262.34(c)(1)(i) → 265.173(c).
4. Failure to describe emergency equipment capabilities in the RCRA Contingency Plan, 40CFR 262.34(g)(4) → 265.52(e).
5. Failure to include a description of actions needed to respond to an explosion in the RCRA Contingency Plan 40CFR 262.34(g)(4) → 265.52(g).
6. Failure to designate one emergency coordinator as primary, and list the others in the order they will assume responsibility as alternates in the RCRA Contingency Plan, 40CFR 262.34(g)(4) → 265.52(d).

If you have any questions regarding these findings please contact

Gary Witkowski, US EPA

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Julia M. Hume

TITLE: EHS Manager

SIGNATURE: Julia M. Hume

This document was prepared by William F. Starks

RCRA 05/25/2017



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NOTICE OF PRELIMINARY FINDINGS (Continued)

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7. Failure to label universal waste mercury containing equipment container
with the words, "universal waste mercury containing equipment," or "waste
mercury containing equipment," or "used mercury containing equipment,"
40 CFR 273.14(d)(1).

INITIALS OF RECIPIENT: int
INITIALS OF PREPARER: W.F.